

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

|   |   |   |
|---|---|---|
| In re:  | ) |   |
|   | ) | Chapter 7                                       |
| TEAM SYSTEMS INTERNATIONAL, LLC, <sup>1</sup> | ) |   |
| Debtor.                                       | ) | Case No. 22-10066 (CTG)                         |
|   | ) |   |
|   | ) | Hearing Date: May 16, 2022 at 3:00 pm (ET)      |
|   |   | Objection Deadline: May 9, 2022 at 4:00 pm (ET) |

**FIRST AND FINAL APPLICATION OF GELLERT SCALI BUSENKELL & BROWN,  
LLC, AS COUNSEL FOR DEBTOR AND DEBTOR-IN-POSSESSION, FOR  
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND FOR  
REIMBURSEMENT OF ALL ACTUAL AND NECESSARY EXPENSES INCURRED  
FOR THE PERIOD MARCH 7, 2022 THROUGH MARCH 31, 2022**

|   |  |
|---|--|
| Name of Applicant:  | GELLERT SCALI BUSENKELL & BROWN, LLC                 |
| Authorized to provide<br>professional services to:                        | Debtor   |
| Date of retention:  | April 25, 2022 <u>nunc pro tunc</u> to March 7, 2022 |
| Period for which<br>compensation and<br>reimbursement is sought:          | March 7, 2022 through March 31, 2022                 |
| Amount of compensation<br>sought as actual, reasonable<br>and necessary:  | \$70,529.00 <sup>2</sup>                             |
| Amount of reimbursement<br>sought as actual, reasonable<br>and necessary: | \$1,258.68   |
| This is a: First and Final Fee Application                                |  |
| Prior Applications Filed: None.   |  |

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<sup>1</sup> The Debtor in this chapter 11 case has a last four digit federal tax ID of 8411. The location of the Debtor's service address in this chapter 11 case is 16192 Coastal Highway Lewes, Delaware 19958.

<sup>2</sup> This Final Application includes time expended in the preparation of this Final Application.

**COMPENSATION BY PROFESSIONAL****Team Systems International, LLC**

(Case No. 22-10066 (CTG))

March 7, 2022 through March 31, 2022

| <u>Name of Professional Person</u> | <u>Position of the Applicant</u> | <u>Hourly<br/>Billing<br/>Rate</u> | <u>Total<br/>Billed<br/>Hours</u> | <u>Total<br/>Compensation</u> |
|------------------------------------|----------------------------------|------------------------------------|-----------------------------------|-------------------------------|
| Ronald S. Gellert                  | Member                           | \$475.00                           | 54.90                             | \$26,077.50                   |
| Michael Busenkell                  | Member                           | \$450.00                           | 0.10                              | \$45.00                       |
| Margaret F. England                | Of Counsel                       | \$400.00                           | 43.20                             | \$17,160.00                   |
| Bradley P. Lehman                  | Associate                        | \$375.00                           | 61.10                             | \$22,912.50                   |
| Ashley Gollmann                    | Paralegal                        | \$160.00                           | 22.70                             | \$3,632.00                    |
| Richard Bennett                    | Paralegal                        | \$130.00                           | 5.40                              | \$702.00                      |
|                                    |                                  |                                    |                                   |                               |
| <b>GRAND TOTAL</b>                 |                                  |                                    | <b>187.40</b>                     | <b>\$70,529.00</b>            |

**COMPENSATION BY PROJECT CATEGORY****Team Systems International, LLC**

(Case No. 22-10066 (CTG))

March 7, 2022 through March 31, 2022

| <b>Project Category</b>                | <b>Code</b> | <b>Total<br/>Hours</b> | <b>Total Fees</b>  |
|--|-------------|------------------------|--------------------|
| Case Administration                    | B110        | 42.20                  | \$14,682.50        |
| Meetings/Communications with Creditors | B150        | 0.40                   | \$190.00           |
| Fee/Employment Applications            | B160        | 11.50                  | \$3,051.00         |
| Other Contested Matters                | B190        | 4.70                   | \$1,429.50         |
| Financing/Cash Collateral              | B230        | 10.70                  | \$4,480.00         |
| Claims Administration and Objections   | B310        | 0.10                   | \$16.00            |
| Dispositive Motions                    | L240        | 93.40                  | \$37,099.50        |
| Written Discovery                      | L310        | 0.30                   | \$120.00           |
| Document Production                    | L320        | 0.30                   | \$48.00            |
| Expert Discovery                       | L340        | 0.40                   | \$160.00           |
| Discovery Motions                      | L350        | 18.70                  | \$7,372.50         |
| Other Discovery                        | L390        | 4.70                   | \$1,880.00         |
| <b>Totals</b>                          |             | <b>187.40</b>          | <b>\$70,529.00</b> |

**EXPENSE SUMMARY**  
**Team Systems International, LLC**

(Case No. 22-10066 (CTG))  
March 7, 2022 through March 31, 2022

| Expense Category                         |         | Total Expenses    |
|--|---------|-------------------|
| Courier Services/Legal Services/Mailings | Parcels | \$686.08          |
| PACER Charges                            |         | \$348.80          |
| Photocopy Charges (at \$0.10/page)       |         | \$178.60          |
| In-House Postage                         |         | \$45.20           |
| <b>Total Expenses</b>                    |         | <b>\$1,258.68</b> |

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| In re:  | ) |   |
| TEAM SYSTEMS INTERNATIONAL, LLC, <sup>1</sup> | ) | Chapter 7                                       |
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LLC, AS COUNSEL FOR DEBTOR AND DEBTOR-IN-POSSESSION, FOR  
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND FOR  
REIMBURSEMENT OF ALL ACTUAL AND NECESSARY EXPENSES INCURRED  
FOR THE PERIOD MARCH 7, 2022 THROUGH MARCH 31, 2022**

Gellert Scali Busenkell & Brown, LLC (“GSBB”), counsel for the above-captioned Debtor and Debtor-in-possession, Team Systems International, LLC, (“Debtor”), submits this First and Final Application (the “Application”) for allowance of compensation for services rendered by GSBB to the Debtor for the period March 7, 2022 through March 31, 2022 (the “Compensation Period”) and reimbursement of actual and necessary expenses incurred by GSBB during the Compensation Period under sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), the United States Trustee’s Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses filed under 11 U.S.C. § 330, effective January 30, 1996 (the “U.S. Trustee Guidelines”). In support of the Application, GSBB submits the verification of Ronald S. Gellert, Esq. attached hereto. In

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<sup>1</sup> The Debtor in this chapter 11 case has a last four digit federal tax ID of 8411. The location of the Debtor’s service address in this chapter 11 case is 16192 Coastal Highway Lewes, Delaware 19958.

further support of this Application, GSBB represents as follows:

### **JURISDICTION**

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory bases for the relief requested herein are sections 330 and 331 of the Bankruptcy Code.

### **FACTUAL BACKGROUND**

3. On January 18, 2022, (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of title 11 of the Bankruptcy Code. The Debtor is authorized to continue to operate its business and manage its properties as a Debtor and Debtor-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

4. The events leading up to the Petition Date and the facts and circumstances supporting the relief requested herein are set forth in the Declaration of Deborah Evans Mott in Support of Debtor's Chapter 11 Petition and First Day Motion (the “Mott Declaration”).

5. On March 31, 2022, the Court entered the Order Converting Chapter 11 Case to a Chapter 7 Case [D.I. 151].

6. On March 31, 2022, George L. Miller was appointed as the Chapter 7 Trustee.

### **GSBB’S RETENTION**

7. By application, filed on March 8, 2022, the Debtor requested authority to retain GSBB as counsel in connection with the above referenced bankruptcy case [D.I. 115].

8. On April 25, 2022, the Court entered the Order Authorizing the Debtor to Employ Gellert Scali Busenkell & Brown, LLC as Bankruptcy Counsel Effective as of March 7, 2022 [D.I. 160].

9. Notice of this Application has been provided to (a) the Office of the United States Trustee for the District of Delaware; (b) the Chapter 7 Trustee and (c) all parties that have requested notice pursuant to Bankruptcy Rule 2002. The Debtor submits that no other or further notice be provided.

### **RELIEF REQUESTED**

8. GSBB respectfully requests that it be allowed (i) compensation in the amount of \$70,529.00, for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Compensation Period, (ii) reimbursement of \$1,258.68 for reasonable, actual and necessary expenses incurred during the Compensation Period. This Final Application includes time in connection with the filing and service of this Final Application.

### **GSBB'S APPLICATION FOR COMPENSATION AND FOR REIMBURSEMENT OF EXPENSES**

#### **Compensation Paid and Its Source**

9. All services for which GSBB requests compensation were performed for or on behalf of the Debtor.

10. GSBB has received no payment and no promise for payment from any source other than the Debtor for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between the Debtor and any other person other than the partners of GSBB for the sharing of compensation to be received for services rendered in this case.

**Fee Statements**

11. The total sum due to GSBB for professional services rendered on behalf of the Debtor for the Compensation Period is \$70,529.00, will be due and payable upon approval of Application. To the best of GSBB's knowledge, this Application complies with section 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules and the Local Rules. GSBB's time reports are manually entered into the time keeping system by the attorney or paralegal performing the described services. The time reports are organized on a daily basis. GSBB charges for its professional services which are based up on the time, nature, extent and value of such services and the costs of comparable services other than in a case under the Bankruptcy Code.

**Actual and Necessary Expenses**

12. The total sum due to GSBB of actual and necessary expenses incurred on behalf of the Debtor is \$1,258.68. In accordance with Local Rule 2016-2(e)(iii), all copy charges are billed no more than \$0.10 per page. GSBB records the numbers of copies made for each client on a daily basis.

13. GSBB believes the foregoing rates are the market rates that the majority of law firms charge clients for such services.

**Summary of Fees and Expenses**

14. GSBB has provided monthly fee and expenses statements that are attached hereto as Exhibit A for the Compensation Period. These statements indicate the services performed by category with more detailed identification of the actual services provided and further identifying the attorneys and paraprofessionals who rendered services relating to each category, along with the number of hours for each individual and the total compensation for each category. GSBB attempted to place the services provided in the category that best relates to such services. However,

because certain services may relate to one or more categories, services pertaining to one category may in fact be included in another category.

15. GSBB has endeavored to represent the Debtor in the most expeditious and economical manner possible. Tasks have been assigned to attorneys and paralegals at GSBB so that work has been performed by those most familiar with the particular matter or task and, where attorney or paralegal involvement was required, by the lowest hourly rate professional appropriate for a particular matter. GSBB believes it has been successful in this regard.

16. The undersigned has reviewed the requirements of Local Rule 2016-2 of the United States Bankruptcy Court for the District of Delaware and certifies to the best of his information, knowledge and belief that this application complies with Local Rule 2016-2.

WHEREFORE, GSBB submits this Application and respectfully requests that this Court (i) authorize and allow fees of \$70,529.00 in compensation for professional services rendered and \$1,258.68 for actual and necessary expenses incurred for the period of March 7, 2022 through March 31, 2022; (ii) authorize and direct the Debtor to pay to GSBB the amount of \$71,787.68; and (iii) granting such other relief as this Court deems just and proper.

Dated: April 25, 2022

**GELLERT SCALI BUSENKELL & BROWN, LLC**

/s/ Ronald S. Gellert

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*Counsel to Debtor and Debtor-in-Possession*



**VERIFICATION**

Ronald S. Gellert, Esquire, do hereby certify as follows:

1. I am an attorney at law admitted to practice in the State of Delaware, the State of New Jersey and the Commonwealth of Pennsylvania. I am a Member in the applicant firm, Gellert Scali Busenkell & Brown, LLC.

2. I have personally performed many of the legal services rendered by Gellert Scali Busenkell & Brown, LLC, as counsel to the Debtor and Debtor-in-Possession (the “Debtor”) *nunc pro tunc* to March 7, 2022, and am thoroughly familiar with all other work performed on behalf of the Debtor by the lawyers and paraprofessionals in the firm.

3. The facts set forth in the foregoing Final Application are true and correct to the best of my knowledge, information and belief.

April 25, 2022

/s/ Ronald S. Gellert  
Ronald S. Gellert (DE 4259)